

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

JUANA EDITH VELA-SALINAS

)

) No. 3:11-000083-19

)

) THE HONORABLE

) WILLIAM HAYNES,

) CHIEF JUDGE

JUANA EDITH VELA-SALINAS' MOTION  
TO RECONSIDER ORDER REQUIRING  
DEFENDANT TO RELEASE BUSINESS RECORDS

Defendant, Juana Edith Vela-Salinas, respectfully requests that this Honorable Court reconsider and reverse its Order requiring Defendant to release the business records of El Shaddai. There is no requirement in the Federal Rules of Criminal Procedure, the Federal Rules of Evidence, or the Local Rules of Court that require such disclosure.

Furthermore, as this Court noted in the Hearing on the Government's Motion to Continue the trial, the defense was under absolutely no obligation to disclose the Report of Accountant Ron Hickman. The defense voluntarily disclosed the Report. The defense should not now be forced to give up documents that it is not required to disclose.

For these reasons, Defendant respectfully requests that this Honorable Court reconsider and reverse its decision

*ORDER*  
*The motion*  
*is GRANTED but*  
*in light of Lucas*  
*the Order must*  
*be REAFFIRMED*  
*and documents*  
*necessary to*  
*test the defense*  
*reports must be*  
*made*  
*available*  
*to challenge*  
*the report*  
*opinions*  
*under*  
*Daubert*

*Will*  
*7-23-14*